

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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LEWIS S. CLARK and PATRICIA E. CLARK, :
Individually and on Behalf of All Others :
Similarly Situated, :

Plaintiffs, :

v. :

BARRICK GOLD CORPORATION, AARON :
W. REGENT, JAMIE C. SOKALSKY, and :
AMMAR AL-JOUNDI, :

Defendants. :

No. 1:13-cv-03851-RPP

CLASS ACTION

**NOTICE OF MOTION AND MOTION
FOR CONSOLIDATION,
APPOINTMENT AS LEAD
PLAINTIFF, AND APPROVAL OF
LEAD PLAINTIFF'S SELECTION OF
COUNSEL**

----- X
CLEMENT BERNARD, Individually and on :
Behalf of All Others Similarly Situated, :

Plaintiff, :

v. :

BARRICK GOLD CORPORATION, AARON :
W. REGENT, JAMIE C. SOKALSKY, and :
AMMAR AL-JOUNDI, :

Defendants. :

No. 1:13-cv-04123-RPP

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CITY OF BROCKTON RETIREMENT :
SYSTEM, Individually and on Behalf of All :
Others Similarly Situated, :

Plaintiff, :

v. :

BARRICK GOLD CORPORATION, AARON :
W. REGENT, JAMIE C. SOKALSKY, and :
AMMAR AL-JOUNDI, :

Defendants. :
----- X

No. 1:13-cv-05437

TO: ALL PARTIES AND THEIR COUNSEL OF RECORD

PLEASE TAKE NOTICE that proposed Lead Plaintiff Union Asset Management Holding AG and LRI Invest S.A. (collectively, the “Institutional Investor Group”), will move this Court, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, NY 10007, for an order: (1) consolidating the related actions; (2) appointing the Institutional Investor Group as Lead Plaintiff pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”); (3) approving the Institutional Investor Group’s selection of Motley Rice LLC as Lead Counsel on behalf of the proposed Class; and (4) approving Labaton Sucharow LLP as Liaison Counsel on behalf of the proposed Class. In support of this motion, the Institutional Investor Group submits the accompanying Memorandum of Law and the Declaration of Christopher J. Keller.

DATED: August 5, 2013

Respectfully submitted,

LABATON SUCHAROW LLP

s/ Christopher J. Keller

Christopher J. Keller

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*Liaison Counsel for Plaintiff and
[Proposed] Liaison Counsel for the Class*

MOTLEY RICE LLC

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843/216-9450 (fax)

[Proposed] Lead Counsel for the Class

CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2013, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on August 5, 2013.

s/ Christopher J. Keller

Christopher J. Keller

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